with a request from said data processor;

a first bus, having m (wherein m is an integer) bits width, connected between said memory and said memory controller, for transferring m bits of data in parallel; and

a second bus, having n (wherein n is an integer, n > m) bits width, connected between said memory controller and said data processor, for transferring n bits of data in parallel;

wherein said memory controller comprises:

a storage for temporarily storing graphic data read out from said memory in successive groups of m bits of data during a predetermined period of time through said first bus,

means for forming n bits of data using said successive groups of m bits of data and supplying said n bits of data in parallel to said data processor through said second bus based on an indication from said data processor, and

a converter for converting said graphic data temporarily stored in said storage into serial data which is provided to said output means based on an indication from said data processor.

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REMARKS

Claims 44-66 stand rejected under 35 USC §251 as being based on an allegedly defective Reissue Declaration. This rejection set forth by the Examiner is based on a Supplemental Reissue Declaration filed on August 17, 1995.

This rejection is rendered moot and Applicants respectfully request the Examiner to reconsider and withdraw this rejection being that a new Supplemental Reissue Declaration is being filed on even date herewith. The new Supplemental Reissue Declaration is being filed based upon the requirements as now set forth in the revised Rules of Practice, particularly 37 CFR §1.175.

The Supplemental Reissue Declaration sets forth at least one error upon which the Reissue was being filed. It should be noted that there may be numerous other errors that are being corrected by the Reissue application, but only one needs to be listed. In the Supplemental Reissue Declaration, it is pointed out specifically that Applicants believe:

> "The original patent to be wholly or partly inoperative or invalid by defective specification and claiming less and/or more than we had a right to claim in the patent"

Thus, there are several errors causing the patent to be wholly or partly inoperative, one being a defective specification, another being claiming less than they had a right to claim in the patent, and still another being claiming more than they had a right to claim in the patent. Thereafter, in the Supplemental Reissue Declaration, the one error being described is where Applicants claimed less than they had a right to claim. In other words, the error was that the claims could have been drafted more broadly. This error contrary to the Examiner's allegation is embodied in the currently pending claims particularly, when for example,

claim 59 is viewed relative to the claims 1-8 set forth in the granted patent. Claims 1-8 set forth in the granted patent are directed to, for example, a graphic processing apparatus having memory means, data processing means, memory control means, memory data bus and processor data bus. There are no claims set forth in the granted patent which are directed to only the memory controller as recited in claims 59 or 63 without the other elements of the graphic processor as set forth in claims 1-8 of the granted patent. Therefore, it would appear that claims 59 and 63 are broader in some respects relative to the claims of the granted patent contrary to the allegation set forth by the Examiner.

Further, even when viewing the other claims, they are broader in some respects relative to the claims of the granted patent and, at the same time, narrower in other respects relative to the claims of the granted patent. Thus, here again, since the error lies in not drafting the claims more broadly, then the inclusion of claims which are broader in some respects relative to the claims of the granted patent corrects the error.

Accordingly, it is completely appropriate to recite that one of the error is that the claims were not claimed as broadly as they should have been claimed being that this is merely one of the many errors that may have been corrected by the Reissue patent application, and that such broader claims are included in the presently pending claims.

Therefore, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of the claims under

35 USC §251.

Claims 44-58 and 63-66 stand rejected under 35 USC §103 as being unpatentable over Graciotti in view of Takenaka and Pinkham. This rejection is traversed for the following reasons. Applicants submit that the features of the present invention as now recited in claims 44-58 and 63-66 are not taught or suggested by Graciotti, Takenaka and Pinkham whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

This rejection is the same rejection set forth by the Examiner in the March 11, 1997 Office Action and addressed by the September 11, 1997 Amendment. Particularly, it was shown in the remarks of the September 11, 1997 Amendment that the features of the present invention as recited in the claims are not taught or suggested by Graciotti, Takenaka and Pinkham whether taken individually or in combination with each other as suggested by the Examiner. The remarks of the September 11, 1997 Amendment are incorporated herein by reference.

The Examiner still have yet to show in any convincing manner how the combination of Graciotti, Takenaka and Pinkham teach or suggest the numerous features recited in claims 44-58 and 63-66. It appears that the Examiner is using hindsight in order to meet the features of the present invention as recited in the claims. The Examiner has not pointed to any objective teachings in any of the references

which even hint that the combination of such references can be accomplished as alleged by the Examiner. The Examiner in the Office Action makes various allegations as to where the suggestion of such combinations can be found. However, upon complete and full review of such passages in the references, it is quite clear that the Examiner is merely making unsupported allegations which has no basis in any of the references of record nor are the allegations appropriate when making a *prima facia* case of obviousness. In fact, the Examiner admits on numerous occasions of the lack of teaching in the references of record of specific features recited in the claims.

For example, the Examiner admits that Graciotti does not disclose the claimed conversion means. However, the Examiner alleges that such is known in the art as taught by Pinkham. Applicants fail to find any teaching whatsoever in Pinkham of a conversion means as recited in the claims. In fact, the connections and the purposes behind the respective circuits disclosed by Graciotti and Pinkham are entirely different. Thus, one of ordinary skilled in the art would not have been lead by any teaching in Graciotti or in Pinkham to combine the respective circuits thereof as alleged by the Examiner. The Examiner seems to be merely making allegations to support a failed attempt to make a *prima facia* case of obviousness under 35 USC §103.

Numerous other features recited in the claims have not been addressed by the Examiner. Particularly, the Examiner has failed to show in any of the references of record of a

converter corresponding to, for example, the CPLT 40 illustrated in Fig. 1 wherein graphic data temporarily stored in the storage is converted into serial data which is provided to output means based on an indication from the data processor. Such an element is clearly not taught or suggested by Graciotti, Takenaka or Pinkham whether taken individually or in combination with each other.

In light of the above, Applicants submit that the features of the present invention as recited in claims 44-58 and 63-66 are not taught or suggested by Graciotti, Takenaka or Pinkham whether taken individually or in combination with each other as suggested by the Examiner.

Applicants note that the Examiner did not reject claims 59-62 based on prior art. Therefore, Applicants assume that claims 59-62 are allowable over the prior art of record. An indication of allowance of claims 59-62 is respectfully requested.

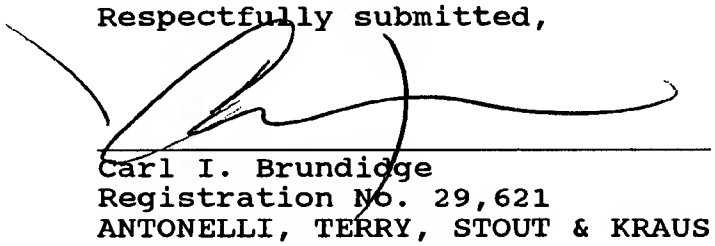
The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references utilized in rejection of claims 44-58 and 63-66.

In view of the foregoing amendments and remarks Applicants submit that claims 44-58 and 63-66 are in condition for allowance. Accordingly, early allowance of these claims is respectfully requested.

To the extent necessary, applicants petition for an extension of time under 37 C.F.R. section 1.136. Please charge any shortage in the fees due in connection with the

filing of this paper, including extension of time fees, to Deposit Account No. 01-2135 (Case No. 500.26967R00) and please credit any excess fees to such Deposit Account.

Respectfully submitted,



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